database computer further including a credit verification means, and wherein the database

computer automatically accesses the credit verification means for credit verification of

said callers based on said data received from said remote terminal apparatus.

REMARKS

This is in response to the Office Action dated June 4, 2002. Claims 29-42 are pending

and stand rejected. With respect to the rejected claims, Applicant urges the Examiner to

reconsider her rejections, based on the arguments presented here. Reconsideration of this

application is respectfully requested.

I.   Rejection of Claims 29-32 Under 35 U.S.C. § 103(a)

In paragraph 1, the Examiner rejects claims 29-32 under 35 U.S.C. Section 103(a) as

unpatentable over the publication by Hester (first reference) in view of Szlam (second reference)

and further in view of Foster (yet another, third reference). Clearly, the Examiner is using

hindsight to combine the references in the manner suggested. Without pointing out any

distinctions that may exist between the claimed system and Hester and Szlam, at the very least,

Applicant notes that the Examiner asserts Foster for its teaching of *"the desirability of verifying*

customer information by checking the expected digit count as well check sum information in

order to provide billing and order security." The Examiner points to column 7, lines 36-65, to

support her assertion. Applicant respectfully submits that in Foster, indeed, any check of the

expected digit count as well as check sum information relates to the order information and not to

the customer's identification. Applicant's claims require that *"the certain data"* that serves to

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identify the caller comprise a total number of digits that always total a particular numerical value.

II.   Rejection of Claims 33-35 Under 35 U.S.C. § 103(a)

With respect to claims 33-35, the Examiner introduces yet another reference (fourth reference) to support her rejection under 35 U.S.C. Section 103(a). The Examiner relies on Riskin for generating sequence numbers and on Foster for verifying customer information by checking the expected digit count as well as check sum information. At the very least, Applicant submits that the even if the references were combined in the manner suggested by the Examiner, claim 33, and thus 34 and 35 (by virtue of their dependency on 33) would still be distinct because it is the caller identification data that is checked to ensure that a precise number of digits always total a particular numerical value.

III.   Rejection of Claims 36-42 Under 35 U.S.C. § 103(a)

In paragraph 6 of the office action, claims 36-42 are rejected under 35 U.S.C. Section 103(a) as being unpatentable over the combination of Hester (first reference) and Szlam (second reference), and further in view of Barger (third reference) and Foster (fourth reference). Again, without pointing out any distinctions that may exist between the claimed system and Hester and Szlam, at the very least, Applicant notes that the Examiner asserts Foster for its teaching of *"the desirability of verifying customer information by checking the expected digit count as well check sum information in order to provide billing and order security."* The Examiner points to column 7, lines 36-65, to support her assertion. Applicant respectfully submits that in Foster, indeed, any

check of the expected digit count as well as check sum information relates to the order

information and not to the customer's identification.

CONCLUSION

Reconsideration and allowance of this application based on the reasons urged here is

respectfully requested. Also, in paragraph 8 of the office action, the Examiner indicated that

Masson also shows that checking for a precise number of digits at column 6, lines 54-67.

Applicant respectfully submits that Masson merely discloses a check to ensure that the proper

number of digits of say an account number are entered within a proper length of time. That is

not the same as a check digit verification that determines if the precise number of digits total a

particular value. Favorable consideration and allowance of the claims here is respectfully

requested.

Respectfully submitted,

Dated: 12/4/02

By:
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MARKED VERSION:

33.   (Amended)   A process for controlling operations of an interface with a

telephonic communication system including remote terminals for individual callers, wherein

each of said remote terminals comprises a telephonic instrument including voice communication

means and digital input means in the form of an array of alphabetic numeric buttons for

providing data and wherein said telephonic communication system has a central capability to

automatically provide call data signals indicative of called number identification data (DNIS),

said process including the steps of:

receiving said call data signals indicative of called number identification data

automatically provided by the telephonic communication system (DNIS) including a

called number dialed by individual callers to select a specific operating format from a

plurality of operating formats within said operations of the interface;

generating sequence data relating to transactions with at least certain callers and

storing the sequence data;

providing verbal prompts to said callers in accordance with said specific operating

format from a plurality of predetermined messages and for receiving data from said

callers in response to verbal prompts wherein at least certain of the data <u>including caller</u>

<u>identification data is checked to determine that the caller identification data</u> comprises a

precise number of digits that always total a particular numerical value; and

providing a database computer for storing said data for said callers received in

accordance with said specific operating format in a form having an identifiable

relationship to each caller, said data stored to update a file for each of said callers that

maintains a historical record for each caller and is used for subsequent processing, said

database computer further including a credit verification means, and wherein the database computer automatically accesses the credit verification means for credit verification of said callers based on said data received from said remote terminal apparatus.